

REMARKS

It is noted that in the Office Action dated December 21, 2004, claims 128 to 133 were allowed.

It is noted that claims 69, 70, 73, 74, 112 and 114 were objected to as being dependent upon a rejected base claim but were deemed to be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims.

It is again noted that the file does not contain a Patent Drawing Review by the Patent Office Draftsperson. It is requested that this Review be undertaken and a Review be issued in response to this Amendment.

It is again noted that the file does not contain an acknowledgment of the claim for foreign priority. It is requested that such an acknowledgment be included in the response to this Amendment.

With respect to the listing of the pending claims, in the Restriction Requirement of the Office Action dated March 9, 2004 (page 3), claim 79 was listed as one of the generic claims. In applicants' Response to Restriction, dated May 7, 2004, applicants elected, *inter alia*, generic claim 79. Claim 79 does not depend from an unelected or canceled claim, so it is believed that its status should be "pending". An appropriate indication is requested.

Independent claims 47 and 98 and dependent claims 49-51, 53-61, 65, 66, 76-78, 80, 81, 84, 85, 87, 90, 94, 97, 99, 100-110, 113, 121 and 127 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,931,143 (Karvinen) in view of U.S. Patent No. 5,256,257 (Schiel).

In Karvinen, the paper web is dried and transported supported by wires and belts. However, Karvinen does not disclose any means for applying a surface treatment substance to the web, as the Examiner acknowledges (Office Action, page 3). Schiel discloses a press section of a paper making apparatus that includes a belt 8 and means for cleaning the belt 8 after the web has been removed from that belt 8. That cleaning means comprises a scraper 22, a spray tube 24 and a brush roll 23. Clearly, the purpose of Schiel's cleaning means is to remove residue substances from the belt and to keep the belt clean, certainly not to apply anything to the web. The Office Action contends that it would be obvious to combine the teachings of Karvinen and Schiel to result in applicants' claimed invention. Apparently, the Office Action contends that a device that removes substances adhering to a belt using (in part) a cleaning solution is the same

thing as a device that applies a coating material (for example) to a web. (Office Action, page 3). The Office Action supplies or suggests no teaching or motivation to modify such a belt cleaning apparatus in the way suggested in the Office Action to result in a paper web coating apparatus, and such a modification would not be reasonable to a person of ordinary skill in the pertinent art.

The purpose of Schiel's cleaning means is to keep the belt clean and prevent any substances entering the nips I, II on the central roll O between the web and the belt 8 in the shoe press rolls 11, 12. Any foreign matter in these shoe press rolls will spoil the web since it would leave definite imprints on the web that is formed. The teaching that a person of ordinary skill in the art obtains from Schiel is that the belt entering a nip formed with a shoe press roll should be kept clean and free of any foreign matter. This teaching bears no relationship to the invention recited in applicants' independent claims 47 and 98, in particular because applicants' invention deals with applying a web treatment agent to a web of paper and does not deal with removing foreign matter from a supporting belt.

In addition, the cleaning apparatus described in Schiel is not suitable for applying a coating agent to a belt (or, for that matter, to a paper or board web), and the Examiner does not contend otherwise; therefore, Schiel does not suggest a combination of Schiel with Karvinen, and, in fact, suggests that no such combination should be made.

Even if the teachings of Karvinen and Schiel could be combined as suggested in the Office Action, the resulting combination is not the invention recited in applicants' claims. Independent claims 47 and 98 recite that the web treatment substance is applied to the web prior to a first dryer cylinder. Both of Karvinen and Schiel are silent about spreading any surface treatment agent whatsoever to the web in their respective press sections, and both references, obviously, are also silent as to exactly where a web treatment agent should be applied to the web. The Office Action does not explain why a person of ordinary skill in the art would be motivated (1) to modify the cleaning apparatus of Schiel into an applicator apparatus, and then (2) to place such an apparatus before the first dryer cylinder, as recited in applicants' claims.

It is therefore submitted that the only way that a person of ordinary skill could merely approach, but not even arrive at, the invention recited in applicants' independent claims 47 and 98 is by hindsight reconstruction using applicants' claims and disclosure as a template, which is improper. The Office Action provides no express disclosure or suggestion to combine the cited references in the way suggested in the Office Action, and even if there were a motivation to so

combine the references, the invention recited in independent claims 47 and 98 would not result from this improper combination. At best, the combination, arrived at by improperly selecting isolated portions of the cited references, would be a press section with a support belt cleaning apparatus, which is not applicants' claimed invention.

For these reasons, applicants' independent claims 47 and 98 are patentable over the prior art of record. The claims dependent thereon are patentable for the same reasons.

Applicants respectfully submit that this application is in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

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